

EXHIBIT E

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,)	C.A. NO. 04-11193NG
Plaintiff)	
)	
)	
)	
V)	
)	
TIMOTHY CALLAHAN, ET AL.)	
Defendant(s))	
)	

**PLAINTIFF, SHAWN DRUMGOLD'S REQUEST FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANTS, RICHARD WALSH AND THE CITY OF BOSTON**

The Plaintiff, Shawn Drumgold (hereinafter "Plaintiff"), pursuant to Fed. R. Civ. P. 34, requests that Defendants, Richard Walsh and the City of Boston (hereinafter "Defendant"), serve a written response to this Request For Production of Documents within thirty days of service hereof, answering or objecting to each category of documents herein requested to be produced and identify each document as to which Defendant claims a privilege. The Plaintiff further requests that the Defendant produce the documents described herein for inspection and copying at the office of Michael W. Reilly, Esq., Tommasino & Tommasino, Two Center Plaza, Boston, MA 02108.

1. All documents which record, reflect or refer to any of the pretext communications referenced in Interrogatory No. 1 of the Shawn Drumgold's Interrogatories to Defendant, Richard Walsh and Defendant, City of Boston.
2. All documents which record, reflect or refer to any relationship between Madelyn or Rhonda Hamilton and the Boston Police Department or any members of the Boston Police Department, including but not limited to information concerning Madelyn or

Rhonda Hamilton providing information to the Boston Police Department at any time, cooperating with the Boston Police Department at any time, acting as informant(s) for any members of the Boston Police Department at any time, having any contact with any member of the Boston Police Department prior to the shooting of Tiffany Moore, or having any contact with any members of the Boston Police Department after the shooting of Tiffany Moore.

3. All documents which record, reflect or refer to any communications between Madelyn Hamilton or Rhonda Hamilton and any members of the Boston Police Department or any investigator, private investigator or person acting on behalf of any Defendant, including but not limited to any such communications which record, reflect or refer to Shawn Drumgold, Rosemary Scapicchio or any members of the Boston Police Department..

Respectfully submitted,

By His Attorney,



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